

EXHIBIT A

From: Helen Chaitman
To: Klein, Benjamin D.; Crook, Darren; Proano, David; Shifrin, Maximillian S.
Cc: Klestadt, Tracy L. (Klestadt Winters Jureller Southard & Stevens, LLP); Scott, Brendan M. (Klestadt Winters Jureller Southard & Stevens, LLP); Yavitz, Noah B.
Subject: RE: Picard v. Gertrude E. Alpern Revocable Trust et al., Adv. Pro. No. 10-04327
Date: Monday, February 01, 2016 4:08:22 PM

Mr. Klein: We have written to Judge Bernstein this morning requesting the opportunity to file a motion to hold the Trustee's counsel in contempt for serving these subpoena before any discovery has been served on the defendants. Please confirm that JPMorgan Chase will not produce any documents to the Trustee without sufficient notice to me so that I can seek judicial relief.

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From: Klein, Benjamin D. [mailto:BDKlein@wlrk.com]
Sent: Monday, February 01, 2016 11:11 AM
To: Crook, Darren <dcrook@bakerlaw.com>; Proano, David F. (Baker Hostetler LLP) <dproano@bakerlaw.com>; Shifrin, Maximillian S. (mshifrin@bakerlaw.com) <mshifrin@bakerlaw.com>
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Klestadt, Tracy L. (Klestadt Winters Jureller Southard & Stevens, LLP) <tklestadt@klestadt.com>; Scott, Brendan M. (Klestadt Winters Jureller Southard & Stevens, LLP) <bscott@klestadt.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>
Subject: Picard v. Gertrude E. Alpern Revocable Trust et al., Adv. Pro. No. 10-04327

Counsel,

Please see the attached Responses & Objections on behalf of nonparty JPMorgan Chase Bank, N.A. to the Plaintiff's subpoena in the above-captioned proceedings. We understand that this subpoena is being held in abeyance and the attached Responses and Objections are being served out of an abundance of caution.

Regards,
Ben

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Thank you in advance for your cooperation and assistance.

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